

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$25,000.00 IN UNITED
STATES CURRENCY FROM APPLE BANK
FOR SAVINGS ACCOUNT ENDING IN 0791,

Defendant.

VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM

The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

Nature of the Action

1. This is a civil action to forfeit property to the United States of America for violations of Title 18, United States Code, Section 1343.

The Defendant In Rem

2. The defendant approximately \$25,000.00 in United States currency was seized on or about February 16, 2018, when the United States Secret Service received a check in that amount from Apple Bank For Savings, following the Secret Service's execution of seizure warrant #18-M-1209, on the bank in New York, New York.

3. United States Magistrate Judge William E. Duffin of the Eastern District of Wisconsin had issued that warrant on or about January 11, 2018. The warrant authorized the seizure of \$25,000 from Apple Bank For Savings account, ending in 0791, and held in the name of Ibrahim Salifu.

4. The defendant property was seized in New York, New York, and is presently in the custody of the United States Secret Service in Milwaukee, Wisconsin.

Jurisdiction and Venue

5. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

6. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

7. Venue is proper in this district under 28 U.S.C. § 1355(b)(1) because the acts or omissions giving rise to the forfeiture occurred, in part, in this district.

Basis for Forfeiture

8. The defendant property is subject to forfeiture under Title 18, United States Code, Sections 981(a)(1)(C) and 984, because it constitutes or was derived from proceeds traceable to an offense constituting “specified unlawful activity” – as defined in Title 18, United States Code, Section 1956(c)(7), with reference to Title 18, United States Code, Section 1961(1) – namely, wire fraud, committed in violation of Title 18, United States Code, Section 1343.

Facts

Background

9. In a November 2010 publication, the United States Federal Trade Commission issued a warning to U.S. consumers about sending money to people who purport to be United States soldiers living outside of the United States. Warning signs of a purported-soldier scam include messages from the purported soldier to the recipient: expressing a desire to date immediately, claiming instant feelings of love, claiming to be a U.S. citizen overseas, planning to visit the victim but unable to do so because of some tragic event, and asking for money to pay for things, such as travel, travel documents, medication, or costs associated with a supposedly forthcoming lucrative business deal.

10. In January 2017, the U.S. Army Criminal Investigation Command had distributed an online public announcement warning victims of online romance scams in which scammers identify themselves as U.S. soldiers.

11. Open source queries of internet websites for fraud victims revealed numerous scams in which subjects pose as military soldiers, purport they have found gold, and request unwitting victims to send money to the purported soldiers to help the purported soldiers pay the cost of the transporting the gold they purported to possess.

Opening of Apple Bank For Savings account ending in 0791

12. Apple Bank For Savings account ending in 0791 (“ABFS 0791”) was opened on or about August 31, 2015, in Bronx, New York.

13. The sole account holder of ABFS 0791 is Ibrahim Salifu, 3XX E. 158th St., Apt. 2A, Bronx, New York.

September 5, 2017 wire transfer of \$6,000 to Bank of America account ending in 6511

14. Around March 9, 2017, a victim having the initials “B.G.,” who resides in the Eastern District of Wisconsin, communicated with a person purporting to be “Sarah Downing” through an online dating website, Match.com.

15. “Sarah Downing” falsely and fraudulently represented to B.G. that she was a combat medic deployed to Kabul, Afghanistan.

16. “Sarah Downing” purported that she wanted to immediately enter into a relationship with B.G.

17. “Sarah Downing” requested that B.G. send her Apple iTunes gift cards or wire money through Western Union and MoneyGram.

18. B.G sent two iTunes gift cards and conducted various MoneyGram, Walmart, and Western Union wire transfers at “Sarah Downing’s” direction.

19. “Sarah Downing” later told B.G. that she found a stash of gold while on a mission and needed help getting the gold back to the United States.

20. “Sarah Downing” asked B.G. to wire transfer \$6,000 from B.G.’s Wells Fargo Bank account to Bank of America account ending in 6511, which was owned by Ibrahim Salifu. The purported purpose of the wire transfer was for the purchase of equipment, payment of fees, and purchase of disposable phones for the transfer of the gold.

21. On September 5, 2017, based on the false and fraudulent representations set forth in paragraphs 19 and 20, B.G wire transferred \$6,000 from B.G.’s Wells Fargo Bank account to Bank of America account ending in 6511.

22. The \$6,000 was not used to purchase equipment, pay fees, or buy disposable phones for the transfer of the gold.

23. Between September 5, 2017, and at least May 11, 2018, B.G has not received any gold bars or compensation for the \$6,000 wire transfer, and neither “Sarah Downing” nor Ibrahim Salifu have repaid B.G. any money.

24. Bank of America account ending in 6511 was closed on or about September 13, 2017, due to fraud.

September 12, 2017 wire transfer of \$25,000 to ABFS 0791

25. On or about September 12, 2017, “Sarah Downing” asked B.G. to wire transfer \$25,000 from B.G.’s account at Educator’s Credit Union, located at 1201 Marquette Ave., South Milwaukee, Wisconsin, which is located in the Eastern District of Wisconsin, to ABFS 0791, which is owned by Ibrahim Salifu. The purported purpose of the wire transfer was to have “James Freeman,” a diplomat from Cape Town, South Africa, accompany the gold during travel and pay for a “diplomatic release tag” in the United Kingdom.

26. On September 12, 2017, based on the false and fraudulent representations set forth in paragraph 25, B.G. wire transferred \$25,000 from B.G.’s Educator’s Credit Union account to ABFS 0791.

27. The \$25,000 was not used to pay for “James Freeman” to accompany gold during travel or to pay for a “diplomatic release tag.”

28. Between September 12, 2017, and at least May 11, 2018, B.G has not received any gold bars or compensation for the \$25,000 wire transfer, and neither “Sarah Downing” nor Ibrahim Salifu have repaid B.G. any money.

29. B.G. was the victim of a fraud scam.

30. The \$25,000 that B.G. wire transferred to ABFS 0791 on September 12, 2017, constituted proceeds of that fraud scam.

31. The defendant property constitutes or is traceable to B.G.'s September 12, 2017 wire transfer of \$25,000 to ABFS 0791.

Investigation into Ibrahim Salifu

32. Ibrahim Salifu is not a member of any branch of the United States military.

33. IC3.gov (Internet crime complaint center) identifies Ibrahim Salifu as a suspect in several other romance/military scams where fictitious military personnel contact unwitting U.S. citizens, befriend them, develop an online relationship, and then request money be sent to Ibrahim Salifu via a money service bureau or direct wire transfer.

Warrant for Arrest In Rem

34. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

Claim for Relief

35. The plaintiff repeats and incorporates by reference the paragraphs above.

36. By the foregoing and other acts, the defendant property constitutes or was derived from proceeds traceable to specified unlawful activity, namely, wire fraud, committed in violation of Title 18, United States Code, Section 1343, and is therefore subject to forfeiture to the United States of America under Title 18, United States Code, Sections 981(a)(1)(C) and 984, with cross-references to Title 18, United States Code, Sections 1956(c)(7) and 1961(1).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant property, approximately \$25,000.00 in United States currency from Apple Bank For Savings account ending in 0791, be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the

defendant property to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 11th day of May, 2018.

Respectfully submitted,

MATTHEW D. KRUEGER
United States Attorney

By:

s/SCOTT J. CAMPBELL
SCOTT J. CAMPBELL
Assistant United States Attorney
Scott J. Campbell Bar Number: 1017721
Attorney for Plaintiff
Office of the United States Attorney
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 530
Milwaukee, Wisconsin 53202
Telephone: (414) 297-1700
Fax: (414) 297-1738
E-Mail: scott.campbell@usdoj.gov

Verification

I, Jason Vanderwerff, hereby verify and declare under penalty of perjury that I am a Detective with the West Allis Police Department, currently assigned to the United States Secret Service Milwaukee Resident Office Financial Crimes Task Force ("MFCTF"), that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 9 through 33 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Detective with the MFCTF.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: May 11, 2018

s/JASON VANDERWERFF
Jason Vanderwerff
Detective
United States Secret Service Milwaukee Resident
Office Financial Crimes Task Force

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box: ☐ Green Bay Division ☒ Milwaukee Division

I. (a) PLAINTIFFS

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff _____
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Scott J. Campbell, AUSA
US Attorney's Office, #530 Federal Building
517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)

DEFENDANTS

APPROXIMATELY \$25,000.00 IN UNITED STATES CURRENCY
FROM APPLE BANK FOR SAVINGS ACCOUNT ENDING IN 0791

County of Residence of First Listed Defendant New York, New York

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Med. Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input checked="" type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition) <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIW W (405(g)) <input type="checkbox"/> 864 SSDI Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify) ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
18 U.S.C. §§ 981(a)(1)(C) and 984
Brief description of cause:

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 **DEMAND \$**

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER _____

DATE

SIGNATURE OF ATTORNEY OF RECORD

05/11/2018

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT #

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
AT LAW AND IN ADMIRALTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$25,000.00 IN UNITED
STATES CURRENCY FROM APPLE BANK
FOR SAVINGS ACCOUNT ENDING IN 0791,

Defendant.

WARRANT FOR ARREST IN REM

To: THE UNITED STATES SECRET SERVICE
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 11th day of May, 2018, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 984, and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not be decreed; and due proceedings being had, that the defendant property be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the defendant property, approximately \$25,000.00 in United States currency, which was seized on or about February 16, 2018, from Apple Bank for Savings account ending in 0791 held in the name of Ibrahim Salifu, and which is presently in the custody of the United States Secret Service in

Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court.

Dated this ____ day of _____, 2018, at Milwaukee, Wisconsin.

STEPHEN C. DRIES
Clerk of Court

By:

Deputy Clerk

Return

This warrant was received and executed with the arrest of the above-named defendant.

Date warrant received: _____

Date warrant executed: _____

Name and title of arresting officer: _____

Signature of arresting officer: _____

Date: _____